

Daniel M. Baczynski, Bar No. 15530
Baczynski Law
12339 S. 800 E. Ste. 101
Draper UT 84020
(801) 255-5555 Phone
dan@bskilaw.com

LAW OFFICES OF TAD D. DRAPER P.C.
Tad D. Draper, Bar #4311
12339 South 800 East Ste. 101
Draper, Utah 84020
(801) 553-1700
(801) 255-5588 fax
Legaljustice3@gmail.com

**IN THE UNITED STATES DISTRICT COURT
STATE OF UTAH, CENTRAL DIVISION**

CYNTHIA STELLA, and the ESTATE OF
HEATHER MILLER,

Plaintiffs,

vs.

DAVIS COUNTY, SHERIFF TODD
RICHARDSON, MAVIN ANDERSON,
JAMES ONDRICEK

Defendants.

**REQUEST TO SUBMIT FOR
DECISION MOTION FOR
PARTIAL SUMMARY
JUDGMENT [DN 31]**

Case No: 1:18-cv-002

Judge: Jill Parrish

Plaintiffs Cynthia Stella and the Estate of Heather Miller, by and through their attorneys, and pursuant to DUCiv R 7-3, respectfully submits for decision Plaintiffs' Motion for Partial Summary Judgment [DN 31].

Plaintiffs filed their Motion pursuant to Federal Rule of Civil Procedure 56 on November 21st, 2018. Defendants filed their Opposition to the Motion for Partial

Summary Judgment [DN 41], as well as their own Motion for Summary Judgment [DN 42] on January 11, 2019. Plaintiffs filed a Reply Memorandum [DN 43] on January 25th, 2019. The Motion for Partial Summary Judgment is fully brief.

Also, Defendants' Cross Motion for Summary Judgment is also fully brief, with an Opposing Memorandum [DN 44] filed on February 8th, 2019, and a Reply Brief [DN 47] filed on March 1st, 2019.

Plaintiffs' Motion for Partial Summary Judgment [DN 31] is ready for decision. The parties have requested oral argument.

DATED this 1st day of March, 2019.

/s/ Daniel Baczynski
Attorney for Plaintiffs

CERTIFICATE OF SERVICE

I certify that on this 1st day of March, 2019, I caused **REQUEST TO SUBMIT FOR
DECISION MOTION FOR PARTIAL SUMMARY JUDGMENT [DN 31]** to be
filed with the Court through the ECF system, with service provided on the following:

Jesse C. Trentadue
Noah M. Hoagland
Sarah E. Jenkins
jesse32@sautah.com
nhoagland@sautah.com
sjenkins@sautah.com
SUITTER AXLAND, PLLC
8 East Broadway, Suite 200
Salt Lake City, Utah 84111
Tel: (801) 532-7300
Fax: (801) 532-7355

/s/ Daniel Baczynski